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13 TREASURE ISLAND MEDIA, INC.

14 **IN THE UNITED STATES DISTRICT COURT**
15 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

16 TREASURE ISLAND MEDIA, INC.,
17 a California corporation,

18 Plaintiff,

19 v.

20 JEFFREY R. SMITH, an individual,

21 Defendant.

Case No. 14-CV-01007-EDL

**DECLARATION OF MATT MASON IN
OPPOSITION TO MOTION TO TRANSFER
VENUE**

1 I, Matt Mason, declare as follows:

2 1. I am the General Manager of Treasure Island Media, Inc. ("TIM"), Plaintiff in
3 *Treasure Island Media, Inc. v. Jeffrey R. Smith*, Case No. 3:14-CV-01007-EDL. I make this
4 declaration freely and of my own personal knowledge. If I were called as a witness, I could and
5 would testify competently as to the facts stated herein.
6

7 2. I am signing this declaration under the name Matt Mason, a name that I assumed upon
8 joining TIM. Matt Mason is not my legal name, but it is the name by which I am known in all TIM-
9 related activities, and consumers associate that name with TIM.

10 3. TIM is headquartered in San Francisco, California. The majority of the company's
11 employees work in the San Francisco office. TIM maintains a small, satellite office in New York,
12 New York. Only six employees work in TIM's New York satellite office.
13

14 4. A vast majority of the witnesses, records, and other evidence significant to this dispute
15 is located in San Francisco, California. Around ten TIM employees located in San Francisco will
16 likely be called as witnesses in this dispute. Moreover, all of TIM's corporate records are located in
17 San Francisco. It would be a significant inconvenience to transport these TIM witnesses and records
18 from San Francisco to New York. The inconvenience is especially severe since TIM has already
19 suffered a significant loss in revenue and assets from Defendant's theft of property, misappropriation
20 of trade secrets, cyberpiracy, and other unlawful conduct.
21

22 5. TIM also intends to call around ten non-party witnesses in this dispute, all of whom all
23 are also located in California. It would be a significant inconvenience for these non-party witnesses
24 to travel to New York to testify.

25 6. Defendant Jeffrey R. Smith ("Smith), goes by Ryan Smith on his social media
26 accounts, including on Facebook. Attached as Exhibit A are recent screenshots of Smith's Facebook
27

1 page. According to these screenshots, Smith traveled to California as recently as last week to
2 socialize in Los Angeles and Palm Springs.

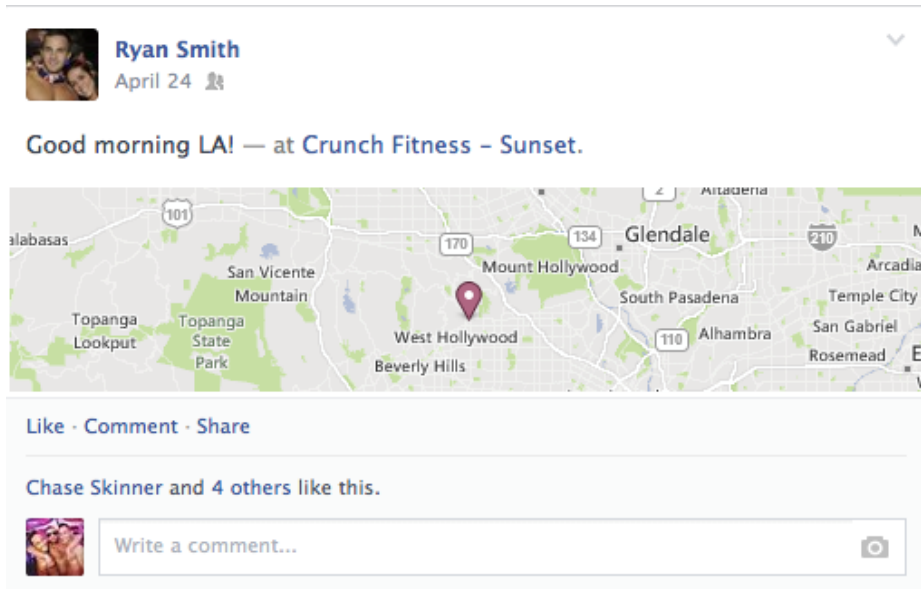
3 I declare under penalty of perjury under the laws of the State of California that the foregoing
4 is true and correct

5 This declaration is executed on April 28, 2014, in San Francisco, California.
6
7

8 
9

10 **Matt Mason**
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EXHIBIT A





James Kim was with Ryan Smith and 2 others.

April 25 near Palm Springs, CA 📍



[Like](#) · [Comment](#) · [Share](#)

[Ryan Smith](#) and 24 others like this.



Marck Garcia Love it

April 25 at 11:35pm · [Like](#)



Daniel Buzahr I wish I WAS THERE with you guyssss

Yesterday at 10:37am · [Like](#) · 👍 1